

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Coronavirus Reporter,

Plaintiff,

v.

Apple Inc.,

Defendant.

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Civil Action No. 1:21-cv-00047-LM

**APPLE INC.’S MOTION TO EXCEED PAGE LIMIT OF ITS
MEMORANDUM OF LAW IN SUPPORT OF ITS
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

Apple Inc. (“Apple”), by and through its attorneys, Sulloway & Hollis, PLLC and Paul, Weiss, Rifkind, Wharton & Garrison LLP, respectfully moves to exceed the page limit of its Memorandum of Law in Support of its Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) by three pages, from fifteen pages to eighteen pages. In support of this Motion, Apple states as follows:

1. Local Rule 7.1(a)(3) (Length of Memorandum) provides: “Except by prior leave of the court, no memorandum in support of, or in opposition to, a nondispositive motion shall exceed fifteen (15) pages and no memorandum in support of, or in opposition to, a dispositive motion shall exceed twenty-five (25) pages.”

2. Apple will submit on this day a Memorandum of Law in Support of its Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) (the “Memorandum”) whose substance is fifteen pages. The document, however, totals eighteen pages after including three pages for the

Memorandum's cover, the signature block, and the certificate of service. Out of an abundance of caution, Apple seeks this Court's leave to file the eighteen-page Memorandum. LR 7.1(a)(3).

3. In its Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a), Apple will move the Court to transfer the above-captioned action to the United States District Court for the Northern District of California. Given the factual history detailed in the Memorandum and the fact that Plaintiff, Coronavirus Reporter, seeks damages of at least \$600 million dollars, permitting Apple to submit a Memorandum that is fifteen pages in substance, and eighteen pages total, is justified and appropriate. *See* Am. Compl. at 28 (ECF No. 17).

4. No memorandum of law is necessary in connection with this motion, as the relief requested is within the sound discretion of the Court. LR 7.1(a)(1)(2).

5. Given the nature of the underlying Motion to Transfer, the concurrence of counsel for Plaintiff, Coronavirus Reporter, was not sought for this motion. LR 7.1(c).

WHEREFORE, Apple requests that this Honorable Court:

- A. Grant this motion to exceed the page limit of Apple's Memorandum of Law in Support of its Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) by three pages, from fifteen pages to eighteen pages; and
- B. Grant such other and further relief as the Court deems just and equitable.

Respectfully submitted,

APPLE INC.

By and through its attorneys,
SULLOWAY & HOLLIS, PLLC

Date: March 11, 2021

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CERTIFICATE OF SERVICE

I hereby certify that this pleading was filed through the ECF/CM system and will be sent to all parties of record through ECF/CM.

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Date: March 11, 2021

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